

THE ROSEN LAW FIRM, P.A.

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[Proposed] Lead Counsel for Lead Plaintiff and Class

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ELI GOITEIN, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

v.

JUST ENERGY GROUP INC.,
DEBORAH MERRIL, JAMES LEWIS,
PATRICK MCCULLOUGH, and JIM BROWN,

Defendants.

CASE No.: 1:19-cv-07181-JGK

**NOTICE OF MOTION OF
GREGORY GUTMAN TO: (1)
CONSOLIDATE RELATED
ACTIONS; (2) APPOINT LEAD
PLAINTIFF; AND (3) APPROVE
LEAD PLAINTIFF'S SELECTION
OF COUNSEL**

CLASS ACTION

THADDEUS WHITE, on behalf of hims
and all others similarly situated,

Plaintiff,

v.

JUST ENERGY GROUP, INC., PATRICK
MCCULLOUGH, and JIM BROWN,

Defendants.

CASE No.: 1:19-cv-08236-JGK

CLASS ACTION

[Additional Case Caption on Following Page]

ANDRE BRODEUR, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

JUST ENERGY GROUP INC.,
DEBORAH MERRIL, JAMES LEWIS,
PATRICK MCCULLOUGH, and JIM
BROWN,

Defendants.

CASE No.: 1:19-cv-08286-JGK

CLASS ACTION

PLEASE TAKE NOTICE that pursuant to Section 21D of the Securities Exchange Act of 1934, 15 U.S.C. § 78u-4(a)(3)(B), as amended by the Private Securities Litigation Reform Act of 1995 (the “PSLRA”), Plaintiff Gregory Gutman (“Movant”) hereby moves this Court, the Honorable John G. Koeltl, United States District Court Judge, on a date and at a time to be designated by the Court, for an order:

- (a) consolidating the related actions;
- (b) appointing Movant to serve as Lead Plaintiff in this action; and
- (c) approving Movant’s selection of The Rosen Law Firm, P.A. as Lead Counsel for the litigation.

In support of this Motion, Movant submits: (i) the Memorandum of Law dated September 30, 2019 (and exhibits); and (ii) a [Proposed] Order Consolidating Related Actions, Appointing Lead Plaintiff, and Approving Lead Plaintiff’s Selection of Counsel.

Dated: September 30, 2019

Respectfully submitted,

THE ROSEN LAW FIRM, P.A.

/s/ Phillip Kim

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*[Proposed] Lead Counsel for Lead Plaintiff
and Class*

CERTIFICATE OF SERVICE

I hereby certify that on September 30, 2019, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/Phillip Kim